

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”) an individual,  
Kenneth Petty, AKA (“Zoo”), an individual

Defendants.

Civil Action No. 21-cv-4568

Declaration of Tyrone A. Blackburn

**Declaration of Tyrone A. Blackburn**

I, Tyrone A. Blackburn, hereby declare according to 28 U.S.C. §1746 as follows:

1. I am an attorney duly admitted to practice in the State of New York. I am also co-counsel for Plaintiff Jennifer Hough (“Ms. Hough”) in the above matter. I have personal knowledge of the facts set forth in this Declaration.
2. I submit this Declaration in Support of Plaintiff’s Motion for Entry of Default Judgment against Defendant Onika Tanya Maraj (“Defendant Maraj”) pursuant to Federal Rules of Civil Procedure (“FRCP”) Rule 55(b) and Local Civil Rule 55.2(b).
3. Prior to filing this motion, I conducted an investigation into whether Defendant Maraj was an active member of the military. Pursuant to Judge Eric N. Vitaliano’s Rules, Rule III. F., I searched for Defendant Maraj on the Servicemembers Civil Relief Act website and confirmed that she is not a member of the military, active or otherwise.
4. I have reviewed the Declaration of Plaintiff’s Process Server, and his Proof of Service affidavit for Defendant Maraj. Process was properly served pursuant to FRCP Rule 4(e)

and, pursuant to the joint letter submitted on October 25, 2021 [Dkt. No. 24] and the Court's subsequent December 8, 2021, Order for filing the instant motion.

5. On August 13, 2021, this case was filed on behalf of Ms. Hough. On September 2, 2021, Ms. Hough filed her first amended complaint.
6. Prior to, and after filing suit, this writer sent several emails to Onika Tanya Maraj's ("Maraj") prior counsel, Peter Ross, and called her current management team. Additionally, I contacted Kenneth Petty's ("Petty") current defense counsels, Hagop Kuyumjian, and Michael A. Goldstein. All the counsels ignored my emails.
7. On September 15, 2021, registered process server, Robert Diaz, served a summons and amended complaint on Petty at his Calabasas, California home located at 23483 Park Colombo, Calabasas, CA 91302. Process server Diaz also served a summons and amended complaint on Maraj through Petty, and subsequently mailed a copy of the summons and amended complaint to Maraj at 23483 Park Colombo, Calabasas, CA 91302.
8. Upon information and belief, Maraj was in the Calabasas, California home listed above on September 15, 2021. This is evidenced from the Instagram live video she shot from her home that evening.
9. The date for Maraj and Petty to answer, and or move with regards to the complaint was October 6, 2021. Maraj and Petty made the conscious decision to ignore this action.
10. On October 11, 2021, five days after their deadline to answer and or move with regards to this complaint, I filed a request for certificate of default from the clerk of the court.
11. On October 14, 2021, Counsel for Maraj, Judd Burstein made an appearance in this case. On October 25, 2021, Counsel for Petty, Steven D. Isser made an appearance in this case.

Petty Sues the State of New York:

12. On August 19, 2021, six days after Ms. Hough filed suit against Petty and Maraj, Petty filed suit against the state of New York in, 1:21-cv-04677-EK-RLM, Petty v. New York State et al.
13. According to his August 19, 2021, court filing, Petty is domiciled in New York and has a residence at 123-40 Inwood Street, Jamaica, New York 11436.
14. Before commencing the instant action, I researched property owned by the Defendants and found that, in 2019, Maraj transferred real property in Long Island, New York, to Petty. Located at 967 Middle Bay Drive, Baldwin, NY 11510.
15. Thus, it was reasonable to assume that – at the very least – the parties, as husband and wife, are both domiciled in New York.
16. On October 23, 2021, four days prior to this declaration, and two days prior to Petty’s counsel making an appearance in this case, Petty and Maraj were both in this district, in Jamaica Queens, New York. As seen on an Instagram live video currently up on Maraj’s Instagram page, both Maraj and Petty were seen associating with members of the Makk Ballers set of the Bloods Gang. Upon information and belief, Petty and Maraj are both members of this gang. **(Exhibit I (10/27 Blackburn Dec.))**.
17. Upon information and belief, Petty can be visibly seen posing and throwing up gang signs with his fellow Makk Ballers Bloods gang members. **(Exhibit J (10/27 Blackburn Dec.))**.
18. On October 23, 2021, shortly after Petty and Maraj are spotted Queens, New York, a member of the gang posted a death threat to Ms. Hough on Twitter, stating: “Jennifer if you see this, the Makks are coming to get you.” **(Exhibit K (10/27 Blackburn Dec.))**.
19. All of the exhibits listed in this declaration are the same exhibits in the declaration signed

by me on October 27, 2021, submitted in support of Ms. Houghs motion for default judgment against Petty. Due to the volume of the exhibits, and in the interest of eliminating redundancy, it is by incorporated herein.

I declare under penalty of perjury that the preceding is true and correct.

Executed on January 28, 2022

*Tyrone A. Blackburn, Esq.*  
Tyrone Blackburn